

Cool, Richard

From: Philip Mobilia <philipmobilia@npsi.us>
Sent: Wednesday, July 06, 2016 1:02 PM
To: Cool, Richard
Cc: Dale Heimgartner; vince@inletfish.com
Subject: RE: North Pacific Seafoods, IFP Kenai Plant; EPA SPCC Inspection Follow-Up

Hi Rick,

Thanks for the prompt response. I appreciate it.

Your comments are good enough for us to act on. I passed your comments / recommendations on the draft SPCC Plan on to our PE and I'll check with her to get the status of the update.

Have a good day.

Phil Mobilia

From: Cool, Richard [mailto:Cool.Richard@epa.gov]
Sent: Wednesday, July 06, 2016 11:23 AM
To: Philip Mobilia
Cc: Dale Heimgartner; vince@inletfish.com
Subject: RE: North Pacific Seafoods, IFP Kenai Plant; EPA SPCC Inspection Follow-Up

Hi Phil:

No, Dale did not get anything more in hard copy from me other than the Notice of Inspection, so you are not missing anything.

I didn't actually create a written list of deficiencies that I then shared with Dale during the inspection on June 17.

As is typical inspection practice, I did a closing conference with Dale where I verbally identified preliminary deficiencies that I observed during the document review and walk-around, some of them historical in nature related to the lack of a PE certified SPCC plan (the 2013 plan), and others. I emphasize preliminary, as is typical, I re-review my notes, observations, photos, etc. after the inspection as I complete a report (not yet done).

If you are interested, we could do a short call and I could reiterate those deficiencies. In terms of the key deficiencies going forward, I think your new updated plan will hit all the boxes if you take into consideration some of the key comments I made on that draft plan (e.g. annual training with documentation, monthly and annual inspection records, security and inspections during off-season, substantial harm certification, secondary containment for portable drums/barrels/totes)

I have good availability from 12:30 – 3:00 today, and on Thursday, 6:30 – 3:00 (**except** 9:00-10:00 or 1:00-2:00), and any time next Monday 6:30- 3:00. I suspect we could talk them through in 15 minutes or less in light of the summary above of some key ones.

I hope this email is responsive but call me if you have questions.

Rick Cool
Water and Wetlands Enforcement Unit
U.S. EPA Region 10
1200 Sixth Avenue, M/S OCE-101
Seattle, WA 98101

Phone: (206) 553-6223
Fax: (206) 553-4743

From: Philip Mobilia [mailto:philipmobilia@npsi.us]
Sent: Wednesday, July 06, 2016 10:45 AM
To: Cool, Richard <Cool.Richard@epa.gov>
Cc: Dale Heimgartner <dale@inletfish.com>; vince@inletfish.com
Subject: North Pacific Seafoods, IFP Kenai Plant; EPA SPCC Inspection Follow-Up

Hi Rick,

We are continuing to work on completing the updates to the IFP Kenai SPCC Plan and hope to have them completed soon. Your note below mentions a list of deficiencies from your 6/17 inspection but I don't think we ever received anything other than the notice attached to your 6/20/16 email. Are we missing something?

Thanks again for your help.

Phil Mobilia

Philip Mobilia
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From: Cool, Richard [mailto:Cool.Richard@epa.gov]
Sent: Monday, June 20, 2016 11:25 AM
To: Philip Mobilia
Subject: FW: EPA SPCC Inspection Follow-Up

Philip, thanks for your call-back and the discussion.

Rick

From: Cool, Richard
Sent: Monday, June 20, 2016 9:19 AM
To: 'philip.mobilia@npsi.us' <philip.mobilia@npsi.us>
Cc: 'dale@inletfish.com' <dale@inletfish.com>
Subject: EPA SPCC Inspection Follow-Up

Hi Philip:

As you might know, I completed a Spill Prevention, Control and Countermeasures (SPCC) inspection at the Inlet Fish Producers (IFP) plant, Kenai, last Friday morning. I want to thank Dale and your company for the cooperation in allowing me to do the inspection on short notice.

For your information, I have attached a copy of the Notice of SPCC Inspection – a similar copy was left with Dale on Friday morning.

I am contacting you as part of my SPCC inspection follow-up for two key purposes.

First, I am requesting a copy of the draft, work-in-progress SPCC Plan that is being prepared for the IFP plant by SLR. Dale had a hand-edited, marked up copy of the June 2016 draft plan at the plant on Friday and he allowed me to review it as part of the inspection's documents review. We agreed that I would make this informal request to you directly for a copy of the draft June 2016 plan. The copy does not need to be the hand-edited version – it can be a clean copy per your preference. I would appreciate it if you could send me the draft plan within the next 5-7 business days, either pdf version by email or hard copy to my office address below.

Second, and as I did with Dale during the closing conference, I want to stress the importance of the Notice's 30-day written submission request if the deficiencies cannot be corrected within that 30-day timeframe. I realize this inspection comes at an extremely busy time for Dale and his team, but he also apprised me that some fixes are already being implemented (e.g., purchase of drum containers).

As noted in the Notice, any written submission should be made to Kate Spaulding at the address in the Notice or by email to Spaulding.kate@epa.gov. I would appreciate it if you would copy me on any submission. In that way, I can help Kate with context and help her digest any submitted information.

I mentioned to Dale my offer to review the draft SPCC Plan and to provide Dale and your SLR representative with feedback that could be considered as work on the draft Plan proceeds. I would likely provide that feedback verbally and I am open as to how to make that work if you are interested in that type of compliance assistance. I could work with Dale, your SLR representative directly or through a company staffperson, whatever you prefer. I am sensitive to Dale's current workload and priorities so whatever method works for you, works for me if you want that feedback.

Again, I appreciate Dale's cooperation, his help and flexibility during this inspection process.

Please call me if you have any questions about this email, the request for the draft copy, or anything related to the inspection.

Thank you for your help.

Rick Cool
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